

KLEHR, HARRISON, HARVEY,
BRANZBURG & ELLERS LLP
Morton R. Branzburg (*Pro Hac Vice Admission Pending*)
Brian T. Crowley (BC-2778)
260 South Broad Street, Suite 400
Philadelphia, PA 19102
Telephone: (215) 568-6060

Attorneys for Manufacturers and Traders Trust Company

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

Hearing Date: July 1, 2009 at 8:a.m.
Objection Deadline: June 29, 2009 at 12:00 noon

In re

Chapter 11

GENERAL MOTORS CORP., *et al.*,

Case No. 09-50026 (REG)

Debtors.

Jointly Administered

**NOTICE OF MOTION SEEKING RELIEF FROM
THE AUTOMATIC STAY, OR IN THE ALTERNATIVE GRANTING
ADEQUATE PROTECTION OR THE TURNOVER OF CERTAIN PROPERTY**

PLEASE TAKE NOTICE that an Order will be presented on behalf of Manufacturers and Traders Trust Company ("M&T Bank"), by its attorneys, Klehr, Harrison, Harvey, Branzburg & Ellers LLP, to the Honorable Robert E. Gerber, United States Bankruptcy Judge, on July 1, 2009 at 8:00 a.m. The proposed Order, a copy of which is annexed hereto, will seek to vacate, pursuant to 11 U.S.C. §§ 362(d) and 105, the automatic stay imposed by 11 U.S.C. § 362 with regard to certain vehicles held by the Debtors; or in the alternative (i) grant M&T Bank adequate protection of its interest in the vehicles, or (ii) the turnover of the vehicles to M&T Bank by the Debtors; all as more fully set forth in the Motion.

PLEASE TAKE FURTHER NOTICE that if you have good reason to object to the granting of the proposed Order, objections must be in writing, must comply with the Bankruptcy Rules and the Local Bankruptcy Rules, and must both (a) be filed with the clerk of the United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, New York 10004, with a stapled copy delivered to the Chambers of the Honorable Robert E. Gerber, United States Bankruptcy Judge by the Objection Deadline, June 29, 2009 and (b) be served, so that they are actually received no later than the

Objection Deadline by: (i) counsel for M&T Bank, Klehr, Harrison, Harvey, Branzburg & Ellers LLP, 260 South Broad Street, Suite 400, Philadelphia, PA 19102, Attn: Morton R. Branzburg, Esq.; and (ii) the Office of the United States Trustee for the Southern District of New York, 33 Whitehall Street, 21st Floor, New York, NY. If no proper objections are timely filed and served and if the Court is satisfied from the Motion that the moving party is entitled to the relief sought, the Court may sign the Order without further notice or a hearing.

If proper objections are timely filed and served, a hearing will be held before the United States Bankruptcy Court, One Bowling Green, Courtroom 621, New York, New York, on July 1, 2009 at 8:00 a.m.

Dated: June 22, 2009

KLEHR, HARRISON, HARVEY,
BRANZBURG & ELLERS LLP

By: /s/ Brian T. Crowley
Morton R. Branzburg (*Pro Hac Vice*
Admission Pending)
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Philadelphia, PA 19102
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